

ORIGINAL

Before the
Federal Communications Commission
Washington, DC

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In the Matter of:

Advanced Television Systems
and Their Impact Upon the Existing
Television Broadcast Service

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MB Docket No. 87-268

To: The Commission
Attention: Media Bureau

FILED/ACCEPTED

JUN 27 2007

Federal Communications Commission
Office of the Secretary

**INFORMAL OBJECTION TO COMMENTS AND WAIVER REQUEST
AND FURTHER COMMENTS AND ENGINEERING STATEMENT OF
CORRIDOR TELEVISION LLP**

Alamo Public Telecommunications Council ("Alamo"), licensee of noncommercial educational television station KLRN, San Antonio, Texas (Facility ID 749), through its council, hereby objects to (a) Comments and Waiver Request ("Waiver Request") of Corridor Television LLP ("Corridor"), licensee of television broadcast station KCWX, Fredericksburg, Texas (Facility ID 24316), filed on January 9, 2007, and (b) Further Comments and Engineering Statement ("Further Comments"), filed on June 12, 2007, seeking to change its tentative channel designation ("TCD") for DTV operations, from channel 5 to channel 8, as set forth in the Post-Transition Table of DTV Allotments proposed in the Seventh Further Notice of Proposed Rule Making, FCC 06-150, released October 20, 2006 ("FNPRM"). In support of this informal objection, the following is set forth.

During the final stage of the DTV allocation process, any request for an alternative channel assignment that causes excess interference must be accompanied by a request for a waiver of the 0.1 percent limit on new interference to a licensee's existing

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TCD. Corridor's request to change its DTV channel from 5 to 8 would result in increased interference to Alamo's KLRN (affecting 0.47 percent of its service area population operating with post-transition digital channel 9) and to KTBC, Austin, Texas, operating with post-transition digital channel 7 (affecting 0.76 percent of its service area population), resulting in a combined interference increase of 1.23 percent.

Corridor has not made a sufficient showing to justify a waiver of the 0.1 percent new interference limitation. Corridor has two in-core channels (its existing analog channel 2 and proposed DTV channel 5), either of which would result in no interference to any other stations. The principal basis offered by Corridor for changing its TCD to channel 8 is that channels 2 and 5 are among the low VHF channels (channels 2-6) which "many stations have chosen to vacate...because of the impulse noise effect that may cause reception difficulties for over-the-air viewers in weak signal areas." Waiver Request, p.3.

As Corridor's KCWX is not currently engaged in digital operations, its concern as to reception difficulties on channel 5 is not fact based but, rather, is speculative and ignores the fact that many stations currently operate digitally with low VHF channels, and will continue to operate with such channels post-transition, without apparent reception difficulties. Corridor states that KCWX is licensed to "a small community located in the Hill Country of Texas...that is rural in nature with a number of small communities disbursed throughout the area." Id. Alamo submits that given the rural nature of the KCWX service area, it is reasonable to presume that noise induced interference will not significantly impede the off-air reception of KCWX, particularly if viewers use externally mounted high gain antennas to receive the KCWX signal (an

assumption which Corridor submits will reduce the interference impact to KLRN of KCWX operating digitally on channel 8). See Further Comments, pages 10-12.

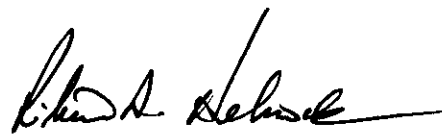
Corridor's channel analysis at Exhibit A of its Waiver Request shows that there are numerous in-core UHF channels available for use by KCWX which would result in no additional interference (channels 18, 35, 36 and 51) or substantially less interference (channels 14, 19, 40, 45 and 47) than would result from its operating on channel 8. The only basis offered by Corridor for rejecting these UHF channels in favor of channel 8 is that the operating costs for a VHF band channel would be less than for a UHF band channel. It may be in the private interest of Corridor to minimize its cost of operating KCWX, but this interest does not necessarily equate with the overall public interest.

For the reasons set forth above, Alamo submits that Corridor has not met its burden to justify a waiver of Commission's interference criteria for KCWX to change its TCD from channel 5 to channel 8.

Respectfully submitted

ALAMO PUBLIC TELECOMMUNICATIONS
COUNCIL

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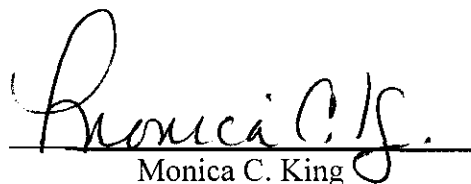
June 27, 2007

CERTIFICATE OF SERVICE

I, Monica C. King, hereby certify that on June 27, 2007, a copy of the foregoing ***"Informal Objection"*** was sent by *First Class mail, postage prepaid*, to the following:

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